

EXHIBIT Q

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August 10, 2022

BY E-MAIL

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Re: United States v. Nikparvar-Fard, 18-101 – Discovery Requests

Dear Mary Kay and Chris:

As you know, we have exchanged multiple emails regarding discovery in the last few months. We write to request a status update as to certain outstanding discovery requests and to confirm the Government's position on numerous issues so that we can bring any necessary motions.

First, we understand the following discovery requests are outstanding. Please let us know when we can anticipate the Government will provide the information requested or produce the below items:

- Information regarding the disparate page counts in the HCC production. We first requested this information by phone shortly after the Government produced HHC000001-069358 on May 4, 2022. We followed up by email on May 27 and June 10.
- We requested the PDMP of Loretta Brown. The Government produced a PDF copy in which the information is scrambled. Please produce an excel version, as was done for all other cooperating or testifying witnesses.
- Scan 15 page 282 report of DC-2017-19-048095 interview of Nikparvar with Philadelphia police detective. Please provide report DC-2017-19-048095

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reference on this page. We first requested this on May 27, 2022.

- Scan 15 page 283 references an interview of Dan Soefling with [REDACTED]. On June 10, 2022, Mr. Parisi represented that the Government previously provided the Upper Moreland reports, along with any federal reports of interview. If that is the case, please confirm the Government does not have this referenced interview.
- The following items were requested on June 29, 2022: Any interviews with Rivera up to the current date.
 - Related to Prior Productions:
 - In the 5/23/19 production, on CD 3, folder N79, Video file 0101.002 is not complete. It is 47.37 min, timestamp indicate it should be 49.57. 2 min and 20 sec is missing.
 - Please produce all reports related to CS-14-147168 ([REDACTED] who is listed on the March 9, 2020 letter and various documents are produced related to his visits to AUC, but no reports) and CS-XX-XXX658 (who is listed in March 9, 2020 letter but no documents related to the source were produced).
 - Please disclose all payments and benefits provided to Sources 79731 and Source 84328, as they were not on the March 9, 2020 letter.
 - The reports related to [REDACTED] indicate she agreed to have her calls recorded on a burner phone. We previously asked for any recordings from that phone but did not receive any recordings or a confirmation whether they existed or not. Please confirm whether any recordings were made or attempted to be made and, if so, please produce them. Please also produce any call logs associated with the burner phone and any reports that were generated related calls received, made, or attempted to be made.
 - Related to Recent Productions:
 - Reports have been produced regarding interviews with [REDACTED] on 3/10/20 and 3/17/20. No recordings were produced

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corresponding to these reports. Please confirm whether such recordings exists and, if so, please produce.

- In the May 10, 2022 production, the document titled “In re [REDACTED] [REDACTED]” is a poor quality scan that is unreadable. Please provide a replacement.
- Please provide an updated NCIC for [REDACTED], [REDACTED], and [REDACTED].
- The reports related to the recordings conducted by [REDACTED] indicate for each date he had two devices on, a watch and cuf button. We believe some recordings are still missing:
 - ID 09 audio recording for 8/24/17
 - ID 11 video recording for date 9/1/17 is not complete.
 - ID 15 video recording for 9/12/17 is not complete
 - ID 17 video recording 9/15/17 not complete
 - ID 22 audio recording 10/20/17 is missing
 - ID 24 missing video between 0382.010 and 0382.011 date 11/1/17
 - ID 26 video 11/2/17 missing
 - ID 29 123117-Br.001 is not complete.
 - ID 30 123117-av.001 od for 12/22/17, and not complete.
- Please produce the text messages referenced in the CHS reports related to Source 84328.
- N76
- N77

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Next, we understand the Government is taking the following positions. Please let us know if you disagree.

- The Government will not be producing additional information related to [REDACTED] or [REDACTED]. Specifically, the Government will not provide any further information regarding [REDACTED] cooperation in other investigations. And will not produce any additional information related to the compensation [REDACTED] received for his cooperation or whether the Government helped him with other charges or otherwise provided him any assistance.
- The Government will not produce any additional information related to the unidentified source recorded in ID26 that was incorrectly labeled. We requested this information on May 27 and June 10.

Let me know if you have any questions or if you would like to discuss any of the above items/issues.

Very truly yours,

/s/ Ann E. Querns

Ann E. Querns

cc: Joseph G. Poluka
Frank DeSimone